8300 Greensboro Dr. 5uite 1200 McLean, VA 22102 www.fcclaw.com Pamela L. Gist (703) 584-8665 pgist@feclaw.com



February 26, 2014

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12th Street, SW Suite TW-A325 Washington, D.C. 20554

Re:

EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2013

California RSA No. 3 Limited Partnership

d/b/a Golden State Cellular

Dear Ms. Dortch:

On behalf of California RSA No. 3 Limited Partnership d/b/a Golden State Cellular, and pursuant to Section 64.2009(e) of FCC rules, submitted herewith is the carrier's CPNI certification with accompanying statement covering calendar year 2013.

Should any questions arise regarding this submission, please contact the undersigned.

Very truly yours,

Pamela L. Gist

Enclosure

ce: Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Annual 64.2009(e) CPNI Certification covering calendar year 2013

Date filed: February 26, 2014

Name of company covered by this certification:

California RSA No. 3 Limited Partnership,

a California limited partnership dba Golden State Cellular

Address:

17400 High School Road

Jamestown, California 95327

Form 499 Filer ID:

807174

By:

Sierra Cellular, Inc.

Its General Partner

Name and

Title of signatory:

By:

Cindy A. Huber

Its Vice President Operations

I, Cindy A. Huber, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 et seq. of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 et seq. of the Commission's rules.

The company has not taken actions (i.e., proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

CALIFORNIA RSA NO. 3 LIMITED PARTNERSHIP, a California limited partnership dba Golden State Cellular

By: SIERRA CELLULAR, INC., Its General Partner

Cindy A. Huber

Its Vice President Operations

Date: <u>February</u> 25, 2014

Attachment: Accompanying Statement explaining CPNI procedures

Explanation of actions taken against data brokers (if applicable)

Summary of customer complaints (if applicable)

Company Name ("Carrier"): California RSA No. 3 Limited Partnership d/b/a Golden State Cellular

STATEMENT

Carrier has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has adopted a manual and keeps it updated with FCC CPNI rule revisions, and has designated a CPNI compliance officer to oversee CPNI training and implementation.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use
 its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI
 was disclosed or provided to third parties, or where third parties were allowed access to
 CPNI. The record includes a description of each campaign, the specific CPNI that was
 used in the campaign, and what products and services were offered as a part of the
 campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI
 rules with respect to outbound marketing situations and maintains records of carrier
 compliance for a minimum period of one year. Specifically, Carrier's sales personnel
 obtain supervisory approval of any proposed outbound marketing request for customer
 approval regarding its CPNI, and a process ensures that opt-out elections are recorded
 and followed.
- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise, and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified
 of account changes including changes to passwords, back-up means of authentication for
 lost or forgotten passwords, or address of record.

- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took the following actions against data brokers in 2013, including proceedings
 instituted or petitions filed by Carrier at a state commission, in the court system, or at the
 Federal Communications Commission: No actions taken
- The following is information Carrier has with respect to the processes pretexters
 are using to attempt to access CPNI, and [if any] what steps carriers are taking to
 protect CPNI: No information received
- The following is a summary of all customer complaints received in 2013 regarding the unauthorized release of CPNI:
 - Number of customer complaints Carrier received in 2013 related to unauthorized access to CPNI, or unauthorized disclosure of CPNI: <u>No</u> <u>complaints received</u>

 - Summary of customer complaints received in 2013 concerning the unauthorized release of CPNI: Not Applicable